

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRUE RETURN SYSTEMS LLC,

Plaintiff,

vs.

MAKERDAO,

Defendant.

Case No. 1-22-cv-8478-VSB-JLC

**PLAINTIFF’S NOTICE OF EX PARTE MOTION FOR
LEAVE TO SERVE DEFENDANT MAKERDAO BY
ELECTRONIC MEANS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declarations in support, and the entire record herein, Plaintiff True Return Systems, LLC (collectively “TRS” or “Plaintiff”) hereby move the Court, ex parte, and pursuant to N.Y. C.P.L.R. §§ 308(5) and 311(b), for entry of an order permitting Plaintiff to serve the Summons, Complaint, and all other pleadings and papers in this action upon Defendant MakerDAO by: (1) direct message to MakerDAO @MakerDAO Twitter account; (2) posting to the official MakerDAO forum at forum.makerdao.com; and (3) e-mail message to support@makerdao.com; and since Plaintiff provided the documents in this manner on October 12, 2022, the Court holds that Plaintiff effectively served Defendant on that date.

No previous application for similar relief has been made.

A Proposed Order is attached hereto.

Dated: November 11, 2022

Respectfully submitted,

BOAG LAW, PLLC

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